

1 PIERCE A. MACCONAGHY (SBN 341371)
2 pierce.macconaghy@stblaw.com
3 SIMPSON THACHER & BARTLETT LLP
4 2475 Hanover Street
5 Palo Alto, CA 94304
6 Telephone: (650) 251-5000
7 Facsimile: (650) 251-5002
8 ANDREW T. FRANKEL (*pro hac vice*)
9 afrankel@stblaw.com
10 MICHAEL H. TORKIN (*pro hac vice*)
michael.torkin@stblaw.com
11 DAVID ELBAUM (*pro hac vice*)
david.elbaum@stblaw.com
12 SIMPSON THACHER & BARTLETT LLP
13 425 Lexington Avenue
14 New York, NY 10017
15 Telephone: (212) 455-2000
Facsimile: (212) 455-2502
16 *Counsel for Century Indemnity Company, as
successor to CCI Insurance Company, as successor
to Insurance Company of North America,
Pacific Indemnity Company, and
Westchester Fire Insurance Company as successor
in interest to Industrial Underwriters Insurance
Company for policies JU835-8355 and JU895-0964*
17
18 *(additional counsel listed on signature page)*

19
20
21
22
23
24
25
26
27
28

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

The Roman Catholic Archbishop of San
Francisco,

Debtor and
Debtor in Possession.

Case No. 23-30564

Chapter 11

**THIRD NOTICE OF CONTINUED
HEARING ON CERTAIN INSURERS'
MOTION FOR RELIEF FROM
AUTOMATIC STAY TO PERMIT
CALIFORNIA COVERAGE ACTION TO
CONTINUE**

Original Date

Judge: Hon. Dennis Montali
Date/Time: January 11, 2024, 1:30 p.m.
Place: Via ZoomGov

Continued Date

Judge: Hon. Dennis Montali
Date/Time: January 25, 2024, 1:30 p.m.
Place: Via ZoomGov

1 **TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**
2 **JUDGE, THE UNITED STATES TRUSTEE, THE DEBTOR, AND ALL CREDITORS**
3 **AND PARTIES IN INTEREST:**

4 **PLEASE TAKE NOTICE** that the hearing (the “**Hearing**”) to consider *Certain Insurer’s*
5 *Motion for Relief from Automatic Stay to Permit the California Coverage Action to Continue*
6 [Docket Nos. 251, 255] (the “**Motion**”)¹ that was previously scheduled for January 11, 2024 at
7 1:30 p.m. has been continued and will be conducted via videoconference on **January 25, 2024 at**
8 **1:30 p.m.** before the Honorable Dennis Montali, United States Bankruptcy Judge. Counsel to the
9 Debtor has consented to continuance of the Hearing.

10 **PLEASE TAKE FURTHER NOTICE** that by this Motion, the Insurers seek to lift the
11 automatic stay to allow a pending state-court coverage action (the “**California Coverage Action**”)
12 to proceed in order to provide guidance and certainty as on to the extent of the Insurers’ coverage
13 obligations, if any, for claims brought by survivors of childhood sexual abuse under the California
14 Child Victims Act against the Archdiocese.

15 **PLEASE TAKE FURTHER NOTICE** that the deadline for the Insurers to file and serve
16 a reply to oppositions to the Motion is now **January 18, 2024**.

17 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting
18 papers can be viewed and/or obtained: (i) by accessing the Court’s website at
19 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
20 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime
21 Clerk LLC, at <http://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
22 U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
23 pginfo@primeclerk.com. Note that a PACER password is needed to access documents on the
24 Bankruptcy Court’s website.

25
26
27

¹ Capitalized terms used but not defined herein shall have the meanings ascribed thereto in the
28 Motion.

Respectfully submitted,

Dated: January 3, 2024

/s/ Pierce A. MacConaghy

PIERCE A. MACCONAGHY (SBN 341371)
2475 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 251-5000
Facsimile: (650) 251-5002
Email: pierce.macconaghy@stblaw.com

ANDREW T. FRANKEL (*pro hac vice*)
afrankel@stblaw.com

MICHAEL H. TORKIN (*pro hac vice*)
michael.torkin@stblaw.com

DAVID ELBAUM (*pro hac vice*)
david.elbaum@stblaw.com

SIMPSON THACHER & BARTLETT LLP
425 Lexington Avenue
New York, NY 10017
Telephone: (212) 455-2000
Facsimile: (212) 455-2502

ALEXANDER POTENTE (SBN 208240)
alex.potente@clydeco.us

JASON J. CHORLEY (SBN 263225)
jason.chorley@clydeco.us

CLYDE & CO US LLP

150 California Street, 15th Floor
San Francisco, CA 94111 USA

Telephone: 415-365-9800
Facsimile: 415-365-9801

Counsel for Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America, Pacific Indemnity Company, and Westchester Fire Insurance Company as successor in interest to Industrial Underwriters Insurance Company for policies JU835-8355 and JU895-0964